

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

DOCKET NO. 3:22-cr-157-KDB

UNITED STATES OF AMERICA)	
)	
v.)	UNOPPOSED MOTION TO
)	CONTINUE DOCKET CALL/TRIAL
)	
DAVID TATUM)	
)	

The Defendant, David Tatum, by and through his counsel of record, respectfully requests that the Court continue the docket call scheduled for November 7th, 2022. In support thereof, the Defendant states as follows:

1. Discovery in this matter includes sensitive materials and forensic evidence which are in FBI custody, and must be reviewed or turned over to Defense Counsel with the assistance of the FBI's Computer Analysis Response Team (CART).
2. Defense Counsel received a call on the morning of October 5th, 2022 from the US Attorney's Office regarding newly uncovered information relevant to this case.
3. Defense Counsel met with representatives from the US Attorney's Office, the FBI, and CART on the afternoon of October 5th to review and discuss this information.
4. Substantial electronic discovery materials are currently being processed with the assistance of CART and are expected to be given to Defense Counsel in the coming days.
5. It is the conclusion of Defense Counsel that additional time will be needed to properly review and analyze these materials.
6. The deadline for filing Continuance Motions is October 24th, 2022.
7. Defense Counsel spoke with AUSA Mark Odulio on October 6th, and has confirmed that the Government does not oppose a continuance in this matter.

WHEREFORE, the Defendant, David Tatum, respectfully requests the Court to grant his Motion to Continue Docket Call/Trial.

RESPECTFULLY SUBMITTED, this the 6th day of October, 2022.

s/ Ryan Patrick Ames
North Carolina Bar # 49651
SeiferFlatow, PLLC
2319 Crescent Ave.
Charlotte, NC 28207
Telephone: 704-512-0606
Fax: 704-314-0677
Email: ryan@seiferflatow.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Notice was duly served by electronic notification on the parties and counsels of record on October 6th, 2022.

s/ Ryan Patrick Ames
Counsel for the Defendant